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8                   **UNITED STATES DISTRICT COURT**  
                     **DISTRICT OF NEVADA**

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10                   UNITED STATES OF AMERICA,  
11    Plaintiff,  
12    vs.  
13                           ZACHARY SANNS,  
14    Defendants.

15    Case No. 2:20-mj-00482-NJK  
16    PROTECTIVE ORDER

17                   The parties, by and through the undersigned, respectfully request that the Court issue an  
18 Order protecting from disclosure to the public, or any third party not directly related to this case,  
any documents, recordings, or other tangible things produced by the Government during  
discovery under Bates stamp number PO 1 (the “Protected Material”). The parties state as  
follows:

19                   1.       The Complaint in the above-referenced case first issued on June 10, 2020.

20                   2.       The preliminary hearing is currently set for July 28, 2020, in the above-referenced  
case. Although discovery is not required under Federal Rule of Criminal Procedure 16 at this  
time, the Government desires to produce discovery, including that discovery designated by Bates  
stamp numbers PO 1, as soon as possible, in preparation for the scheduled preliminary hearing  
and so the parties can have substantive conversations concerning negotiations.

1       3. The complaint in this case arises out of allegations of the false personation of a  
2 federal law enforcement officer. The Protected Material includes materials from the defendant's  
3 phone related to those allegations. Those materials also include personal identifying information  
4 that should not be publicly available, unless necessary at a hearing or trial.

5       4. In order to protect such privacy interests of individuals, the parties intend to  
6 restrict access to the Protected Material in this case to the following individuals: the  
7 defendants, attorneys for all parties, and any personnel that the attorneys for all parties  
8 consider necessary to assist in performing that attorney's duties in the prosecution or  
9 defense of this case, including investigators, paralegals, support staff, and any other  
10 individuals specifically authorized by the Court (collectively, the "Covered Individuals").

11      5. Without leave of Court, the Covered Individuals shall not:

- 12       a. make copies for, or allow copies of any kind to be made by any other  
13                  person of the Protected Material in this case;
- 14       b. allow any other person to read, listen, or otherwise review the  
15                  Protected Material;
- 16       c. use the Protected Material for any other purpose other than  
17                  preparing to defend against or prosecute the charges in the Complaint  
18                  or any indictment or superseding indictment arising out of this case; or
- 19       d. attach the Protected Material to any of the pleadings, briefs, or other  
20                  court filings except to the extent those pleadings, briefs, or filings are  
21                  filed under seal.

22      6. Nothing in this stipulation is intended to restrict the parties' use or introduction  
23                  of the Protected Material as evidence at trial or support in motion practice.

1       7. The parties shall inform any person to whom disclosure may be made pursuant  
2 to this order of the existence and terms of this Court's Order.

3       8. Should a reasonable need for this protective order cease to exist on grounds  
4 other than a Covered Individual or some other person violating or circumventing its terms,  
5 the parties will move for its dissolution for the Court's consideration.

6       9. This Court retains jurisdiction as to any enforcement of this protective order.

7       10. The parties may modify this stipulation in writing if needed.

8       11. The defendant, through his or her respective counsel's signature below, hereby  
9 stipulates to this protective order in each of the above-referenced cases.

10      Dated this 10<sup>th</sup> day of July, 2020

11      Respectfully submitted,

12                   *For the United States of America:*  
13                   NICHOLAS A. TRUTANICH  
14                   United States Attorney

15                   \_\_\_\_\_  
16                   /s/  
17                   CHRISTOPHER BURTON  
18                   Assistant United States Attorney

19                   *For Defendant Zachary Sanns*

20                   \_\_\_\_\_  
21                   /s/  
22                   DAVID T. BROWN

23      **IT IS SO ORDERED:**

24        
25      HONORABLE NANCY J. KOPPE  
26      United States Magistrate Judge

27                   July 10, 2020

28                   \_\_\_\_\_  
29                   Date